

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: LOCAL TV ADVERTISING
ANTITRUST LITIGATION**

This document relates to all actions.

Master Docket No. 18 C 06785

MDL No. 2867

Honorable Virginia M. Kendall

**MOTION FOR LEAVE TO FILE UNDER SEAL THE REPLY MEMORANDUM IN
SUPPORT OF PLAINTIFFS' DISCOVERY MOTION #1:**

**TO COMPEL PRODUCTION OF RATINGS DATA FROM THE NIELSEN COMPANY
(US), LLC AND FROM SINCLAIR BROADCAST GROUP, INC.**

Plaintiffs in the above captioned action, through their undersigned counsel and pursuant to Local Rule 26.2 of the Local Rules of the United States District Court for the Northern District of Illinois, hereby move this Court for leave to file under seal the Reply Memorandum in Support of Plaintiffs' Discovery Motion #1 (the "Reply"). In support, Plaintiffs state as follows:

1. Plaintiffs' Reply discusses and attaches as an exhibit a document produced by defendant Sinclair Broadcast Group, Inc. ("Sinclair").
2. Pursuant to the Agreed Confidentiality Order in this case, the parties are permitted to designate as "CONFIDENTIAL" all "Confidential Information," which may include: (a) information prohibited from disclosure by statute; (b) information that reveals trade secrets; (c) research, technical, commercial or financial information that the Party has maintained as confidential; (d) medical information concerning any individual; (e) personal identity information; (f) income tax returns (including attached schedules and forms), W-2 forms and 1099 forms; or (g) personnel or employment records of a person who is not a Party to the case. ([ECF No. 194, p. 3-4](#)).

3. The Agreed Confidentiality Order further instructs that “[a]ny party wishing to file a document designated as Confidential or Highly Confidential Information in connection with a motion, brief or other submission to the Court must comply with [Local Rule] 26.2” ([ECF No. 194, p. 10](#)).

4. The document in question is designated as “CONFIDENTIAL.”

5. Additionally, the Reply includes specific pricing information for Nielsen ratings data that are the subject of Plaintiffs’ Discovery Motion #1. The Nielsen Company (US), LLC (“Nielsen”) has requested that this information not be part of the public file.

6. Under Local Rule 26.2(c), “[a]ny party wishing to file a document or portion of a document electronically under seal in connection with a motion, brief or other submission must . . . move the court for leave to file the document under seal.” L.R. 26.2(c).

7. In compliance with Local Rule 26.2(c), Plaintiffs will file a public-record version of the Reply that omits the Confidential document attached as an exhibit and redacts, at Nielsen’s request, the pricing information.

WHEREFORE, Plaintiffs request this Court grant them leave to file the Reply under seal.

Dated: August 16, 2022

Respectfully submitted,

/s/ Cyril V. Smith

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